

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

TQ DELTA, LLC,

Plaintiff,

v.

COMMSCOPE HOLDING COMPANY,
INC., COMMSCOPE, INC., ARRIS US
HOLDINGS, INC., ARRIS SOLUTIONS,
INC., ARRIS TECHNOLOGY, INC., and
ARRIS ENTERPRISES, LLC,

Defendants.

Civil Action No.: 2:21-cv-00310-JRG

**DECLARATION OF ANDREW S. ONG IN SUPPORT OF COMMSCOPE'S
OPPOSITION TO PLAINTIFF TQ DELTA'S MOTION TO STRIKE THE EXPERT
TESTIMONY OF DR. GEORGE A. ZIMMERMAN, DR. RICHARD WESEL, DR.
BRUCE MCNAIR, AND DR. NIEL RANSOM (Dkt. 337)**

I, Andrew S. Ong, declare:

1. I am a partner at Goodwin Procter LLP, counsel of record for Defendants CommScope Holding Company, Inc., CommScope Inc., ARRIS US Holdings, Inc., ARRIS Solutions, Inc., ARRIS Technology (collectively, "CommScope"). I am over the age of 18 years, have personal knowledge of the matters in this declaration, and if called as a witness, I would and could competently testify to them.

2. Attached hereto as **Exhibit 10** is a true and correct copy of excerpts from the Rebuttal Expert Report of Dr. Todor Cooklev, dated November 18, 2022.

3. Attached hereto as **Exhibit 11** is a true and correct copy of excerpts from the Opening Expert Report of Dr. Richard Wesel, dated August 29, 2022.

4. Attached hereto as **Exhibit 12** is a true and correct copy of excerpts from U.S.

Provisional Application No. 60/618629.

5. Attached hereto as **Exhibit 13** is a true and correct copy of excerpts from the Opening Expert Report of Vijay Madisetti, Ph.D., dated August 29, 2022.

6. Attached hereto as **Exhibit 14** is a true and correct copy of excerpts from the Responsive Expert Report of Dr. Niel Ransom, dated November 18, 2022.

7. Attached hereto as **Exhibit 15** is a true and correct copy of excerpts from U.S. Patent No. 8,468,411.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 6, 2023, in San Francisco, California.

/s/ Andrew S. Ong
Andrew S. Ong